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Attorneys for the United States 7

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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Ray L. Flores II.

Plaintiff.

v.

Robert F. Kennedy, Jr., as Secretary of the Department of Health and Human Services,

Defendant.

Case No. 2:25-cv-00916-JAD-NJK

Stipulation to Extend Time for United States to Respond to Plaintiff's Complaint (First Request)

Pursuant to Local Rule IA 6-1, Defendant Robert F. Kennedy, Jr., in his official capacity as Secretary of the Department of Health and Human Services ("Secretary" or "Defendant") requests a 14-day extension to file its answer or otherwise respond to Plaintiff's Complaint (ECF No. 1).

This matter is a declaratory relief action alleging violations of the National Childhood Vaccine Injury Act of 1986. Defendant was served with the Summons and Complaint on June 2, 2025. Under Fed. R. Civ. P 12(a)(2), Defendant must answer or otherwise respond to Plaintiff's Complaint by August 1, 2025.

Defendant respectfully requests additional time to respond to the Complaint in order to allow the parties an opportunity to explore the potential for early resolution of this matter before engaging in further litigation. Counsel for Defendant has conferred with Plaintiff, and the parties have agreed to a fourteen (14) day extension of Defendant's

1	deadline to answer or otherwise respond to the Complaint, through and including August	
2	15, 2025.	
3	Accordingly, Defendant respectfully requests the Court grant this stipulation and	
4	extend the time for Defendant to answer or otherwise respond by 14 days, or by August 15	
5	2025.	
6	Respectfully submitted this 25th day of July 2025.	
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8	Dated this 24 day of July 2025.	Dated this 25th day of July 2025.
9	PS SI	SIGAL CHATTAH United States Attorney
10	Ray L. Flores II,	/s/Summer A. Johnson
11	Plaintiff in Pro Per	SUMMER A. JOHNSON Assistant United States Attorney
12		501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101
13		Attorney for Defendant
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17	IT IS SO ORDERED:	
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20	UNITED STATES DISTRICT JUDGE UNITED STATES MAGISTRATE JUDGE	
21		WILD STITLS WINGSTRATE GODGE
22	D.A.	ATED:
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